

EXHIBIT 19



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Transcript of Richard A. Flasck

Date: April 14, 2020

Case: Solas Oled LTD., et al. -v- LG Display Co., LTD., et al.

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1	Q. So the answer to my question is "No," right?	15:16:23
2	A. I answered your question.	15:16:27
3	Q. In paragraph 91, you reference part of the	15:16:33
4	prosecution history, and you state that it: merely	15:16:49
5	indicates that the full plain meaning of "before" or	15:16:55
6	"after" obviously does not cover the situation in	15:16:58
7	which two things happen at the same time -- and only	15:17:00
8	happen at the same time.	15:17:04
9	Correct?	15:17:05
10	A. Yes.	15:17:06
11	Q. And so you agree with Defendants' proposed	15:17:07
12	construction that "before" and "after" cannot mean	15:17:11
13	at the same time, correct?	15:17:15
14	A. I agree, as I state in paragraph 92, that	15:17:16
15	is: A must occur before B starts -- that is not the	15:17:32
16	same as the prior art, in which A and B only happen	15:17:35
17	at the same time.	15:17:40
18	So it's my opinion that if two events begin,	15:17:41
19	continue, and end at the same time, they cannot --	15:17:47
20	those two events cannot be before or after. But if	15:17:50
21	there's an offset in time between the beginning	15:17:55
22	and/or the ending, then I believe that the plain and	15:17:58
23	ordinary definition and use of the term "before" or	15:18:02
24	"after" can come into play.	15:18:05
25	There can be overlap. There can't be	15:18:07

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1 simultaneity.

15:18:10

2 Q. In paragraph 92, you reference the case of a
3 gradation voltage and a compensation voltage being
4 added together, correct?

15:18:13

15:18:17

15:18:20

5 A. Yes.

15:18:22

6 Q. And that is an example of providing things
7 at the same time, correct?

15:18:24

15:18:26

8 A. It says the compensation voltage and the
9 gradation voltage are added to be supplied at the
10 same time as a compensated gradation voltage.

15:18:28

15:18:36

15:18:40

11 So that means that the compensation voltage
12 and the gradation voltage are added, and they're
13 supplied at the same time. The application starts
14 at the same time, it continues through the same
15 time, and it ends at the same time.

15:18:46

15:18:53

15:18:55

15:18:58

15:19:01

16 Q. And you agree that providing a gradation
17 voltage and a compensation voltage cannot be within
18 the scope of "before" and "after" in these
19 statements, correct?

15:19:02

15:19:06

15:19:10

15:19:15

20 A. I'm sorry, the supply -- ask that question
21 again.

15:19:16

15:19:19

22 Q. Yeah. So if a gradation voltage and a
23 compensation voltage are added together and then
24 supplied to a data line, that cannot be -- scenario
25 cannot be encompassed by the terms "before" or

15:19:19

15:19:23

15:19:26

15:19:32